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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

D-1 LAVANTE BROWN,
D-2 JUSTIN FIELDS.

Defendants.

Case:2:22-cr-20267

Judge: Friedman, Bernard A.

MJ: Stafford, Elizabeth A.

Filed: 05-25-2022 At 12:29 PM

INDI USA V. SEALED MATTER (DA)

VIO: 21 U.S.C. § 846

21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(b)(1)(B)(vi)

21 U.S.C. § 841(b)(1)(c)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

(21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(C) - Conspiracy to Possess with Intent to Distribute and to Distribute a Controlled Substance)

D-1 LAVANTE BROWN

D-2 JUSTIN FIELDS

1. Beginning in or about January 2020 and continuing to September 15, 2020, in the Eastern District of Michigan, Southern Division, and elsewhere, the defendants, LAVANTE BROWN, JUSTIN FIELDS, did knowingly and intentionally conspire and agree with other individuals, both known and unknown

to the Grand Jury, to possess with the intent to distribute and to distribute controlled substances.

2. The amount and type of controlled substances attributable to Lavante Brown and Justin Fields as a result of their own conduct, and the conduct of other members of the conspiracy that was reasonably foreseeable to them, are:

- a. A mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propanamide [commonly known as fentanyl], a Schedule II Controlled Substance;
- b. A mixture or a substance containing a detectable amount of heroin, a Schedule I Controlled Substance; and
- c. A mixture or substance containing a detectable amount of cocaine base, a Schedule II Controlled Substance

All in violation of Title 21, United States Code, Section 846 and Sections 841(a)(1), 841 (b)(1)(B)(vi), 841 (b)(1)(C).

COUNT TWO

(21 U.S.C. § 841(a)(1), (b)(1)(C) – Distribution of a Controlled Substance
Resulting in Death; 18 U.S.C. § 2 – Aiding and Abetting)

D-1, LAVANTE BROWN

D-2, JUSTIN FIELDS

3. On or about September 14, 2020, in the Eastern District of Michigan, Southern Division, the defendants LAVANTE BROWN and JUSTIN FIELDS, did knowingly and intentionally distribute a controlled substance, specifically a substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanimide, “fentanyl,” which is a schedule II controlled substance, and as a result of using the substance, Victim C.H. died, all in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C) and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATIONS

1. The allegations set forth above in this Indictment are hereby incorporated by reference as if they were set forth in full herein for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853.

2. Pursuant to Title 21, United States Code, Section 853(a), upon conviction of any of the controlled substance offenses in violation of Title 21, as alleged in this Indictment, the convicted defendant(s) shall forfeit to the United States: (a) any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of such violation; and (b) any property, real or personal, used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violation(s).

3. **Substitute Assets:** If the property described above as being subject to forfeiture, as a result of any act of a defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. 853(p) as incorporated by 18 U.S.C. 982(b), to seek to forfeit any property of such defendant up to the value of the forfeitable property described above.

5. **Money Judgment:** Upon conviction of one or more violations alleged in this Indictment, the United States will seek a forfeiture money judgment against the convicted defendant in an amount representing the total amount of proceeds obtained as a result of the aforementioned offenses, and/or the total amount involved in the violations of Title 21, United States Code, Section 841.

THIS IS A TRUE BILL

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

DAWN N. ISON
United States Attorney

s/ John N. O'Brien, II
JOHN N. O'BRIEN, II
Chief, Drug Task Force
Assistant United States Attorney

s/ Robert White
ROBERT WHITE
Assistant United States Attorney

Dated: May 25, 2022

United States District Court
Eastern District of Michigan

Criminal Case Cover

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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: RW

Case Title: USA v. Lavante Brown, et al.

County where offense occurred : Wayne and Oakland

Check One: ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty**

☒ Indictment/ ☐ Information --- **no** prior complaint.
☐ Indictment/ ☐ Information --- based upon prior complaint [Case number: _____]
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ **Judge:** _____

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

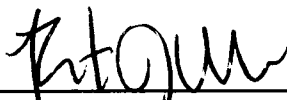
Defendant name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

May 25, 2022
Date


 Robert White
 Assistant United States Attorney
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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.